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PROPOSED ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION**

IN RE:

LAROSE HOSPITALITY, LLC,

Debtor.

§
§
§
§
§

**CASE NO.21-90034
Chapter 11**

DEBTOR'S EMERGENCY MOTION FOR USE OF CASH COLLATERAL

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN FOURTEEN (14) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:

COMES NOW LaRose Hospitality, LLC, the Chapter 11 Debtor in the above styled and referenced bankruptcy case (the “Debtor”), and files this its Motion for Use of Cash Collateral pursuant to 11 U.S.C. § 363 of the Bankruptcy Code and in support of same would respectfully show the following:

1. On February 24, 2021, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor is now operating its business and managing its property as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. Henry Thomas Moran has been appointed the Subchapter V Trustee. No. official committee has been appointed.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of the Chapter 11 case and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Debtor requests the Court to enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit “A.”**

4. Debtor has an immediate need to use the cash collateral of Red Oak Capital Holdings, LLC (the “Secured Lender”), the Debtor’s secured creditor claiming liens on Debtor’s personal property including accounts. The Debtor can adequately protect the interests of the Secured Lender as set forth in the proposed Interim Order for Use of Cash Collateral by providing the Secured Lender with post-petition liens, a priority claim in the Chapter 11 bankruptcy case, and cash flow payments. The cash collateral will be used to continue the Debtor’s ongoing operations. The Debtor operates a Holiday Inn Express & Suites located in Livingston, TX . The Budget attached to the proposed Order permits the payment of ongoing operating expenses of the

Debtor in order to allow the Debtor to maintain its operations in Chapter 11. The Debtor intends to rearrange its affairs and needs to continue to operate in order to pay its ongoing expenses, generate additional income and to propose a plan in this case. The Debtor's proposed Two-Week Budget and One-Month Budget are attached hereto as **Exhibit "B."**

5. This is an emergency matter since the Debtor has no outside sources of funding available to it and must rely on the use of cash collateral to continue its operations.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that this Court enter an Interim Order for Use of Cash Collateral in the form attached hereto as **Exhibit A** and for such other and further relief to which the Debtor may be justly entitled.

Dated: March 2, 2021.

Respectfully submitted,

/s/ Joyce W. Lindauer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 2, 2021, a true and correct copy of the foregoing document was served via United States first class mail, postage prepaid, upon the parties on the attached service list.

/s/ Joyce W. Lindauer

Joyce W. Lindauer

Label Matrix for local noticing

AT&T(20)

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AT&T(20)

0540-9

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Case 21-90034

Carol Stream, IL 60197-5019

Carol Stream, IL 60197-5091

Eastern District of Texas

Lufkin

Tue Mar 2 17:42:26 CST 2021

American Elevator(20)

Anderson Affordable(20)

City of Livingston

PO Box 2709

706 Spring Lake Drive

200 West Church

Baytown, TX 77522-2717

Lufkin, TX 75901-6931

Livingston, TX 77351-3281

FGMS Holdings, LLC(20)

Grass Roots Lawn & Landscape(20)

Guest Supply(20)

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240 Branding Iron

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HD Supply(20)

Home Depot Pro(20)

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Internal Revenue Service

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Royal Cup(20)

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End of Label Matrix	
Mailable recipients	32
Bypassed recipients	0
Total	32